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By ECF:

The Honorable Victor Marrero
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Suite 660
New York, New York 10007

Request GRANTED.

The condition of home detention is hereby modified to a curfew from 9pm until 6am daily, with location monitoring, to be enforced by Pretrial Services.

SO ORDERED.

8/24/2022

DATE


VICTOR MARRERO, U.S.D.J.

Re: United States v. Daniel McIntosh, et. al.
Case No. 22-cr-174-VM
Request for Modification of Bail Conditions

Dear Judge Marrero:

I am counsel for the defendant, Daniel McIntosh who is under electronic monitoring and home detention. Your Honor, AUSA Ashley Nicolas has deferred the following request to Pretrial Services, and Pretrial Services by Intensive Supervision Specialist has consented to modify the defendant's bail conditions and agreed to a daily curfew of 9:00 p.m. to 6:00 a.m. enforced with location monitoring. Defense counsel respectfully submits this letter requesting permission from the Court.

Mr. McIntosh would like to continue to be a good father-companion to his daughter, Skylah, and to do the following activities on weekends that he would normally do on a regular basis before his arrest. On the weekends he would take his daughter, Skylah to breakfast and then for other activities as basketball games, swimming, dancing and tutoring.

On the subject of employment, during weekdays Mr. McIntosh has acquired employment with a Towing Company, Roadside Assistant Corp. from Monday to Friday. Mr. McIntosh has expenses that include paying rent for his current residence, for groceries, clothing for himself and his daughter, pay for all of his daughter's extra-curricular activities mentioned above and preschool and after school programs (including tutoring).

Your Honor, in the words of Intensive Supervision Specialist, "based on the Mr. McIntosh's overall compliance" with the rules of Pretrial Services, the defendant is kindly asking this Honorable Court to take all of the above into consideration and do give him a chance to continue to be involved in his daughter's life and for him to be employed too so that he can manage his financial bills.

The Honorable Victor Marrero
United States District Judge

Thank you Your Honor for your consideration.

Very truly yours,

/s/ Albert Y. Dayan
Albert Y. Dayan, Esq.
Attorney at Law

cc. AUSA Ashley Nicolas (By ECF)
USPO Jonathan Lettieri